

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

SEARS HOLDINGS CORPORATION, et al.,

Debtor.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that pursuant to Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010(b) and section 1109(b) of title 11 of the United States Code, Dorel Industries Inc. (“Creditor”), as creditor, by and through its counsel, Schiff Hardin LLP, hereby respectfully submits this Notice of Appearance and Request for Service of Papers (“Notice of Appearance”) in the above-captioned case and requests that all notices and all papers served or required to be served in this case by the Court, the above-referenced Debtors, and/or any other parties-in-interest, be given to and served upon the following:

SCHIFF HARDIN LLP  
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**PLEASE TAKE FURTHER NOTICE** the Notice of Appearance request includes, without limitation, notices and papers referred to in Bankruptcy Rule 2002 and also includes, without limitation, any plans of reorganization and disclosure statements and objections thereto, notices, orders, pleadings, motions, applications, complaints, schedules of assets and liabilities, operating reports, answering or reply papers, memoranda and briefs in support of any of the foregoing, pleadings, hearing dates, requests, demands, replies and any other documents brought

before this Court with respect to these proceedings, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, or otherwise.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance is without prejudice to the rights, remedies and claims of the Creditor against other entities or any objection by the Creditor, that may be made to the subject matter jurisdiction of the Court or the propriety of venue herein and shall not be deemed or construed to submit the Creditor to the jurisdiction of the Court. This Notice of Appearance shall not be deemed or construed to be a waiver by the Creditor (1) to have final orders in noncore and matters not arising in or under the Bankruptcy Code entered by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (3) of any other rights, claims, actions, defenses, setoffs, or recoupments to which the Creditor, are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Creditor expressly reserve. All rights, remedies and claims are hereby expressly reserved, including without limitation, the making of a motion seeking abstention, withdrawal, dismissal or transfer of the case or proceeding therein

Respectfully submitted,

Dated: New York, New York.  
April 9, 2019

Schiff Hardin LLP

By: /s/ Kayvan B. Sadeghi  
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*Attorneys for Dorel Industries Inc.*